

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

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B.L., a minor, by her father,  
LAWRENCE LEVY, and her mother,  
BETTY LOU LEVY

Plaintiffs,

v.

MAHANAY AREA SCHOOL DISTRICT,

Defendant.

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: Civil Action No. 3:17-cv-1734  
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: (The Hon. A. Richard Caputo)  
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**DECLARATION OF DAVID W. BROWN, ESQ.**

I, David W. Brown, Esq., being duly sworn, do hereby depose and say as follows:

1. I am over the age of 18 years, and am under no mental or other incapacity that would prohibit me from giving a sworn statement or understanding the subject matter of my statement.

2. I am an attorney admitted to the bar of the Commonwealth of Pennsylvania. In this litigation, I serve as co-counsel for the Defendant in this matter and have been involved in all aspects of discovery in this matter.

3. This affidavit is being submitted in support of the Defendant's Motion for Summary Judgment (the "Motion"). Accompanying this affidavit are 16 exhibits that are being submitted in support of the Motion.

4. I hereby certify that each of the exhibits is a true and correct copy of a document either produced by one of the parties in this litigation, used as an exhibit at a deposition in this litigation, or created as a transcript of a deposition conducted as part of this litigation.

5. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on December 20, 2018.

Date: December 20, 2018

/s/ David W. Brown

David W. Brown, Esq.